



NDA 205776

NDA APPROVAL

Medac Pharma, Inc.
c/o B&H Consulting Services, Inc.
50 Division Street, Suite 206
Somerville, NJ 08876

Attention: Stephanie Pierson, RAC
Vice President

Dear Ms. Pierson:

Please refer to your New Drug Application (NDA) dated September 10, 2013, received September 10, 2013, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Rasuvo (methotrexate injection) 7.5 mg/0.15 mL, 10 mg/0.20 mL, 12.5 mg/0.25 mL, 15 mg/0.30 mL, 17.5 mg/0.35 mL, 20 mg/0.40 mL, 22.5 mg/0.45mL, 25 mg/0.50 mL, 27.5 mg/0.55 mL, and 30 mg/0.60 mL.

We acknowledge receipt of your amendments dated December 20, 2013, and January 10, 15, 16, and 23, February 25 and 28, March 21, April 3, 4, 8, 17, and 30, May 6, 9, 16, 23, 28, and 29, and June 4, 12, 17, and July 3, 2014.

This new drug application provides for the use of Rasuvo (methotrexate injection) for the management of patients with severe, active rheumatoid arthritis (RA) and polyarticular juvenile idiopathic arthritis (pJIA), and for symptomatic control of severe, recalcitrant, disabling psoriasis in adults who are not adequately responsive to other forms of therapy.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

EXPIRATION DATING PERIOD

A 17-month expiry dating period is granted for Rasuvo (methotrexate injection) when stored at controlled room temperature between 20°C and 25°C (68°F and 77°F) with excursions permitted from 15°C and 30°C (59°F and 86°F).

WAIVER OF HIGHLIGHTS SECTION

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the patient package insert, text for instructions for use). Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008)*. Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 205776.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for ages 0 through 2 years for pJIA because the disease is extremely rare in this age group and studies would be impossible or highly impractical.

This product is appropriately labeled for use in pJIA patients ages 2 to 17 years. Therefore, no additional studies are needed in this pediatric group.

We are waiving the pediatric study requirement for the psoriasis indication because there is evidence strongly suggesting that the benefit for this drug product does not outweigh the risk in all pediatric age groups.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at

<http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>.

Information and Instructions for completing the form can be found at

<http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>. For

more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Sadaf Nabavian, Senior Regulatory Project Manager, at (301) 796-2777.

Sincerely,

{See appended electronic signature page}

{See appended electronic signature page}

Tatiana Oussova, M.D., M.P.H.
Deputy Director for Safety
Division of Dermatology and Dental Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Badrul A. Chowdhury, M.D., Ph.D.
Director
Division of Pulmonary, Allergy, and
Rheumatology Products
Office of Drug Evaluation II
Center of Drug Evaluation and Research

Enclosures:

Content of Labeling
Carton and Container Labeling

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

TATIANA OUSSOVA
07/10/2014

SARAH K YIM
07/10/2014
Signing for Badrul Chowdhury, M.D., Ph.D.